



# Third Program Year Action Plan

The CPMP Third Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

## Narrative Responses

### GENERAL

#### **Executive Summary**

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 3 Action Plan Executive Summary:

The Mobile County Commission serves as grantee and lead agency responsible for planning and implementing the Consolidated Plan. Direct implementation, administration and responsibility for the operation of the programs and activities set forth in the Consolidated Plan have been assigned to the Mobile County Grants Department.

Mobile County, along with the incorporated cities within the County outside of the City of Mobile, first became eligible for HUD formula grant funds following the 2000 U.S. Census when these jurisdictions combined to reach the statutory population level required. The Mobile County Consortium applied for and received its first funding during program year 2002.

This document, the Mobile County Consortium Annual Action Plan for 2012, represents a planning document for a jurisdiction that comprises of nine incorporated municipalities (Bayou La Batre, Chickasaw, Citronelle, Creola, Mount Vernon, Prichard, Saraland, Satsuma, and Semmes) and all of the unincorporated area of Mobile County, Alabama. The Town of Dauphin Island, elected to withdraw from the Consortium in 2008.

The Plan sets forth a specific plan for investment or use of formula grant funds and other public and private funds that are reasonably expected to be available during each program year. The Annual Action Plan provides a basis for assessing the Consortium's overall performance toward achieving the broad based goals and objectives set forth in the Five Year Consolidated Plan.

At the time of going to press, the County's Five Year Consolidated Plan is being amended to reflect changes to the County's HOME Program and to reflect the new Emergency Solutions Grant.

In addition to a planning document, the Action Plan serves as an application for federal funds under the U. S. Department of Housing and Urban Development (HUD) formula grant programs. These grant programs, for which the Consortium is an entitlement recipient, include: the Community Development Block Grant (CDBG), the HOME Investment Partnership (HOME), the Emergency Solutions Grant (ESG) formerly known as the Emergency Shelter Grants, and the Housing Opportunity for Persons with AIDS (HOPWA). Based on a national funding formula established by Congress and implemented by HUD, the Consortium is a recipient under all of these formula grant programs with the exception of HOPWA.

The Mobile County Consortium utilizes outcome measures for activities in accordance with the Federal Register Notice dated March 7, 2006 that HUD published "Notice of Outcome Performance Measurement System for Community Planning and Development Formula Grant Programs". This notice outlined a system of objectives, along with outcome categories that are to be utilized by grantees when establishing and carrying out grant funded activities. A grantee is to determine which of three objectives best describes the purpose of the activity. These objectives, consistent with the primary objectives of Title I of the Housing and Community Development Act of 1974, are: "Suitable Living Environment", "Decent Housing", and "Creating Economic Opportunities". Similarly, once the objective for the activity is selected, the grantee will then choose which of three outcome categories best reflect the intention of the grantee in funding that activity. The outcomes are: "Availability/Accessibility", "Affordability", and "Sustainability: Promoting Livable or Viable Communities".

Based upon this system of objectives and outcomes, the objectives set forth in the Action Plan, with outcomes in parenthesis, are classified as follows:

Suitable Living Environment-

- Public Facilities (Availability/Accessibility)
- Public Infrastructure (Availability/Accessibility)
- Public Services (Availability/Accessibility)
- Handicapped Accessibility (Availability/Accessibility)

Decent Housing-

- Down Payment Assistance (Affordability)
- DPA Housing Counseling (Affordability)
- Affordable Housing Construction (Affordability)

Overall goals of the community planning and development programs addressed in the Consolidated Plan are to develop viable urban communities by providing decent housing and a suitable living environment, and expanding economic opportunities principally for low- and moderate-income persons. To strive towards meeting these goals, this document describes how the Consortium hopes to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of affordable housing, public works/public facilities and public services.

CDBG funds for 2012 are committed to improving infrastructure through the following projects: resurfacing/paving and striping roads, sewer improvements, and construction of a recreation facility. Funds are committed to the provision of the following public services: homebuyer counseling, prescription drug assistance, assistance for child abuse victims, ADA compliant home modifications, legal services assistance, victim service provider assistance, and domestic violence victim advocacy.

With the HOME Program, the Consortium's main focus during the third year is the provision of affordable housing. The County will utilize a minimum of 15% of the total 2012 HOME allocation for CHDO (as required).

The Consortium supports HUD's national goal of increasing homeownership and rental opportunities for low- and moderate-income persons, especially for minority households. Affordable housing is further supported with the provision of down payment assistance and homeownership counseling. Mortgage assistance is available for housing constructed with HOME funds.

The County currently has one active CHDO - Prichard Housing Corporation, II. A not for profit organizations has expressed interest in becoming a Community Housing Development Organization (CHDO) for Mobile County for participation in the County's Affordable Housing Program.

The Consortium supports HUD's national goal of ending homelessness. In this regard, the Consortium focuses on programs and activities targeted at assisting persons at imminent risk of becoming homeless, thereby preventing homelessness as well as those defined as homeless. Additionally, the Consortium supports and encourages the efforts of the Continuum of Care organization that serves Mobile County for the development permanent supportive housing to end chronic homelessness. The prevention of homelessness has become a major strategy coordinated by the Continuum of Care for assisting households at imminent risk.

In 2012, the County will receive \$155,141 in ESG funds. Mobile County has met with Housing First, Inc., the Continuum of Care lead organization, and plans to enter into a non-competitive sub-grantee agreement with them to manage the competitive process and execute sub-recipient agreements for organizations selected for ESG activities.

Housing First, Inc. has gained substantial experience by successfully administering the Homelessness Prevention Rapid Re-Housing Program (HPRP) for Mobile County, the City of Mobile, and the State of Alabama. They also have experience as a HUD SHP grantee and as a sub-grantee for local HUD funds. Housing First operates the jurisdictional Homeless Management Information System (HMIS) and manages permanent and transitional housing projects. Based on their prior successes working with HPRP and other homeless programs, Housing First has the capacity to administer the Mobile County Emergency Solutions Grant Program in an effective manner.

Upon HUD approval of the 2012 Action Plan, Mobile County Commission would proceed with the sub-grantee agreement with Housing First to create the structure and process required for HMIS, the clearinghouse for clients served, the ESG services to target, and the capacity for financial management of ESG funds.

Housing First, Inc. would extend sub-recipient agreements to established and eligible organizations for ESG activities. ESG funds may be used for the following activities allowed under the McKinney-Vento Homeless Assistance Act as amended: street outreach, emergency shelter, homelessness prevention, rapid re-housing, and administration. An announcement and application instructions would be distributed to organizations that are members of the Continuum of Care (CoC) and that are Homeless Management Information System (HMIS) participants or would agree to participate. A CoC review committee would make recommendations to the Mobile

County Commission regarding the suitability and capacities of sub-recipient applicants. The Mobile County Commission would select the sub-recipient organizations and authorize Housing First, Inc. to execute sub-recipient agreements.

The broader goals expressed in the Consolidated Plan establish the Mobile County Consortium's priorities for housing and non-housing community development needs, the need categories of economic development, public facilities, public infrastructure, public services, and planning. Within these broader categories of housing and non-housing needs are established relative priorities for various specific sub-categories. ***The priorities are set forth in the Housing Needs Table and Community Development Needs in the Consolidated Plan.***

The Consortium holds public hearings and accepts funding proposals for CDBG each program year from public and private agencies within a deadline established annually. All proposals are reviewed by a Project Review Committee and a recommended budget is presented to the Mobile County Commission for final action. The Committee considers proposals based upon eligibility criteria set forth in the federal regulations promulgated by HUD, the extent to which proposals address the priorities and support the goals established in the Consolidated Plan, and how the proposals fit into the availability of formula grant funds. The annual program year for the Mobile County Consortium is June 1 to May 31.

Over the years the County has 1) pursued all resources that it indicated it would pursue, 2) provided requested certifications of consistency for HUD programs in a fair and impartial manner for those programs which it indicated it would support applications by other entities, and 3) did not hinder Consolidated Plan implementation by action or willful inaction. The County has continued to carry out the actions and strategies outlined in its Consolidated Plan, and except for instances where federal funding programs are not available or where resources could not be procured, the County has stayed with established priorities and commitments.

A summary of the proposed plan follows:

#### PROPOSED 2012 YEAR THREE ACTION PLAN SUMMARY

Mobile County Commission as the lead agency of the Mobile County Consortium is required to prepare an Action Plan for each year of the five-year planning period covered by the Consolidated Plan. The Consolidated Plan includes strategies for addressing some of the identified community needs with Community Development Block Grant (CDBG) funds, HOME funds, and Emergency Solutions Grant (ESG) Funds.

The Year Three Action Plan outlines proposed activities to be undertaken with CDBG funds, HOME funds, and ESG funds in 2012. For 2012 the County has been allocated the following: CDBG \$1,621,180, HOME \$543,575, and ESG \$155,141. In addition for the 2012 CDBG budget, previous years reallocated CDBG funds of \$23,991 and \$1,000,000 in anticipated HOME Program Income. A description of the proposed budgets for each program is shown below.

COMMUNITY DEVELOPMENT BLOCK GRANT

Public Facilities/Works

1. Road Resurfacing – City of Prichard	\$ 200,000
2. Sewer Improvements/Road Paving – City of Satsuma	\$ 297,758
3. Recreation Center – City of Saraland	\$ 375,000
4. Road Resurfacing – South Mobile County	\$ 200,000
5. Road Striping – City of Creola	\$ 80,000
Total amount allocated to public facilities/works:	\$1,152,758

Public Services

6. Homebuyer Counseling	\$ 35,000
7. Prescription Drug Assistance	\$ 10,000
8. Child Abuse Victim Assistance	\$ 42,677
9. Home Modifications- ADA Compliant	\$ 10,000
10. Legal Services Assistance	\$ 50,000
11. Victim Service Provider Assistance	\$ 13,000
12. Domestic Violence Victim Advocacy	\$ 7,500
Total amount allocated to public services:	\$ 168,177

Planning and Administration

TOTAL CDBG BUDGET	\$ 324,236
-------------------	------------

\$1,645,171

HOME FUNDS

Acquisition and Rehabilitation of Vacant Single Family Homes	\$ 889,217
Down Payment, Closing Cost, and Mortgage Assistance for Homebuyers	\$ 500,000
Program Administration	\$ 54,358
<u>Program Administration</u> from Anticipated Program Income	\$ 100,000
TOTAL HOME BUDGET	\$1,543,575

2012 Emergency Solutions Grant

Street Outreach	\$ 0
Emergency Shelter	\$ 60,000
Homelessness Prevention	\$ 40,000
Rapid Re-Housing	\$ 18,506
Homeless Information Management System (HMIS)	\$ 25,000
<u>Administration</u>	\$ 11,635
TOTAL ESG	\$ 155,141

Mobile County published a notice of public hearings/comment period on February 27, 2012 and a summary of the Action Plan March 8, 2012 in the Mobile Register. A Public Hearing was held on March 8, 2012. A 30-day comment period, which ends on April 6, 2012, is required prior to the adoption of the Action Plan April 9<sup>th</sup> by the Mobile County Commission and submission to HUD. Comments or suggestions concerning this Action Plan are to be submitted in writing by 4:00 p.m. on April 6, 2012 to Mr. John Pafenbach, County Administrator, Mobile County Commission, P. O. Box 1443, Mobile, AL 36633.

The following table indicates a total entitlement figure of \$3,343,887 and describes the components of that amount:

TABLE A: Federal Resources Fiscal Year 2012 (June 1, 2012 – May 31, 2013)

FUNDING SOURCE	AMOUNT
2012 HUD Community Development Block Grant (CDBG) allocation	\$1,621,180
** Reallocated CDBG funds from previous year(s)	\$23,991
2012 HUD Home Investment Partnership Act (HOME) allocation	\$543,575
HOME Program Income (Anticipated)	\$1,000,000
Emergency Solutions Grant	\$155,141
Total	\$3,343,887

\*\*Reallocated CDBG funds from previous years are from activities that were completed under the original budget or activities that did not take place. Adding these unused funds to the 2012 budget would constitute a formal amendment.

Program Year	CDBG Activity	Unused Funds
2010	Mobile County Road Resurfacing	23,991.00
	Total Unused Funds	23,991.00

#### Match Requirements for the HOME Funds:

Home match for the County has been reduced from 25 percent to 12.5 percent due to Fiscal Distress. The HOME funds match requirement will be in the form of in-kind or cash revenue and expense contributions. If the total revenue match is larger than the required match expense, the difference will be accumulated for later match by the HOME program. In-kind or cash expense match will be contributed from the accumulated match, when HOME funds are drawn.

#### DESCRIPTION OF ACTIVITIES TO BE UNDERTAKEN IN YEAR THREE:

##### A. CDBG FUNDS

The total amount of CDBG funds for the 2012 Year Three Action Plan (June 1, 2012 – May 31, 2013) is \$1,645,171. That amount represents the 2012 allocation of \$1,621,180 and reallocated funds of \$23,991. No program income or urban renewal settlements are anticipated this year. A description of CDBG activities selected for 2012, the third year of the five-year consolidated planning period is shown in Table B that follows:

TABLE B: ACTIVITIES TO BE UNDERTAKEN WITH CDBG FUNDS  
(\$1,621,180 + \$23,991 reallocated funds)

A/B. Public Facilities/Works		\$1,152,758
Activity	Location	Amount Allocated
1. Road Resurfacing	City of Prichard	\$200,000
2. Sewer Improvements/Road Paving	City of Satsuma	\$297,758
3. Recreation Center	City of Saraland	\$375,000
4. Road Resurfacing, Paving	South Mobile County	\$200,000
5. Road Striping	City of Creola	\$80,000
C. Public Services		\$168,177
Activity	Location	Amount Allocated
6. Homebuyer Counseling	County Wide	\$35,000
7. Prescription Drug Assistance	County Wide	\$10,000
8. Child Abuse Victim Assistance	County Wide	\$42,677
9. Home Modifications – ADA Compliant	County Wide	\$10,000
10. Legal Services Assistance	County Wide	\$50,000
11. Victim Service Provider Assistance	County Wide	\$13,000
12. Domestic Violence Victim Advocacy	County Wide	\$7,500
E. Planning and Administration - General Administration and Planning		\$324,236
Total CDBG Funds Available		\$1,645,171

- Public Facilities/Public Works

1. Road Resurfacing- City of Prichard (LMA)

Provide funds to resurface streets in the City of Prichard located in low/mod area. Streets include: Boaz Street, Elm Street East and Elm Street West. Prichard is predominantly a low/mod jurisdiction. This project will improve the City's infrastructure. Proposed benefit: 3,500 people.



2. Sewer Improvements/Road Paving - City of Satsuma (LMA)

Provide funds for sanitary sewer improvements along Williams Avenue. The households rely on individual on-site septic systems. Soil conditions are generally not conducive to septic tank. Residents report frequent problems, such as sewer back up. Faulty discharge lines are present in back yards, causing exposure to raw sewage. These conditions are worsened when heavy rains and flooding occurs. The Consortium will also provide funds to pave 1,350 linear feet of Williams Avenue. Proposed benefit: 52 people.

3. Recreation Center – City of Saraland (LMA)

Provide funds for land acquisition, engineering, infrastructure, construction, and furnishing a Recreation Center. Proposed benefit: 500 people.

4. Road Resurfacing – South Mobile County (LMA)

Provide funds to resurface 10 streets in South Mobile County. These streets include: Janet Avenue, Cindy Drive, Brown Drive, Geary Drive, Gray Drive, Grand Way Drive, Green Drive, Quail Road, 14<sup>th</sup> Street, and 15<sup>th</sup> Street. Proposed benefit: 103 people.

5. Road Striping – City of Creola

Provide funds to stripe approximately 20 miles of roads. Proposed benefit: 800 people.

- Public Services

6. Homebuyer Counseling

Provide funds to a nonprofit organization that has an established framework of communication and outreach to low- and moderate-income persons to conduct Homebuyer Training classes and to provide affirmative marketing of the program. Homebuyer counseling provides low-income homebuyers a guide to the home buying process and good financial management. Homebuyer Training classes are offered at various locations throughout the County in order to provide equal access to all residents of the County to the Down Payment Assistance program and the Construction of Affordable Homes Program. Proposed outcome: 150 people

7. Prescription Drug Assistance

Provide funds for a prescription drug assistance program, which provides pharmaceutical services at no cost to eligible low- and moderate-income persons. The program provides prescription medications as well as patient assistance service to aid patients with obtaining expensive name brand medications directly from the pharmaceutical companies. Proposed outcome: 150 people

8. Child Abuse Victim Assistance

Provide funds to assist with services that provide counseling and transportation to sexually abused child victims and their families living in Mobile County. Proposed outcome: 155 people

9. Home Modifications- ADA Compliant

Provide funds for home modifications for disabled to meet ADA guidelines. Modifications may include but are not limited to construction of ramps and the renovation of bathrooms and restrooms. Proposed outcome: 5 people



10. Legal Services Assistance

Provide funds for legal services assistance for a Homeless Prevention Project. Assistance will include community presentations and address civil legal issues that cause homelessness. Legal Services will represent clients who are facing eviction or foreclosure. Proposed outcome: 400 people

11. Victim Service Provider Assistance

Provide funds to assist with direct services to sexual assault victims and their families. Proposed outcome: 60 people

12. Domestic Violence Victim Advocacy

Provide funds to assist a domestic violence victim advocacy project. Proposed outcome: 40 people

B. ACTIVITIES TO BE UNDERTAKEN WITH HOME FUNDS

The County will receive a total of \$543,575 in HOME Funds for the third year of the planning period and anticipates \$1,000,000 in program income. Funds will be used for acquisition and rehabilitation of vacant single family homes, for mortgage assistance, and for down payment and closing cost assistance.

2012 HOME FUNDS

Acquisition and Rehabilitation of Vacant Single Family Homes	\$ 889,217
Mortgage, Down Payment, and Closing Cost Assistance	\$ 500,000
Program Administration	\$ 54,358
<u>Program Administration</u> – Anticipated Program Income	<u>\$ 100,000</u>
TOTAL HOME BUDGET	\$1,543,575

- Priority (HOME)

Acquisition and Rehabilitation of Vacant Single Family Homes for low/mod income households

The County is committed to the provision of affordable housing for low/moderate income households. During PY2012, the County will provide funds to developers for the acquisition and rehabilitation of up to seven (7) vacant single family homes for low/mod income households. These homes may be offered for sale or may be sold through lease/purchase.

The Consortium partners with nonprofit organizations, banks, realtors, homebuilders and title companies through its homeownership program by providing down payment assistance and payment of closing costs.

The County will partner with nonprofit organization(s) that have an established framework of communication and outreach to low- and moderate-income persons to conduct Homebuyer Training classes (funded through CDBG), and to also provide affirmative marketing of the program. These nonprofits will provide Homebuyer Training classes to guide the low-income households through the home buying process. The applicant household must provide documentation that confirms the household income as households with annual incomes of 80% of the current HAMFI or less, and secure private financing in order to become eligible for down payment assistance and payment of closing costs. The maximum amount of assistance per household is limited to \$10,000 while the minimum amount is \$1,000. This

assistance will be a secured loan (a recorded second mortgage and a promissory note for the amount of assistance provided) with a zero percent interest rate. DPA for homes not constructed with HOME funds, will be limited to first time homebuyer. An independent housing inspector inspects each house before down-payment assistance is given.

There is no first-time homebuyer restriction regarding up to \$10,000 in DPA for homes constructed with HOME funds. The County provides mortgage assistance which includes DPA and closing cost of up to \$40,000 to eligible homebuyers who purchase homes constructed by developers/homebuilders utilizing HOME funds.

While the County did not include a line item in the 2012 HOME Budget for home inspections, the County will continue providing home inspections through the use of funds earmarked in 2010.

#### 2012 Emergency Solutions Grant

Street Outreach	\$ 0
Emergency Shelter	\$ 60,000
Homelessness Prevention	\$ 40,000
Rapid Re-Housing	\$ 18,506
Homeless Information Management System (HMIS)	\$ 25,000
<u>Administration</u>	<u>\$ 11,635</u>
TOTAL ESG BUDGET	\$155,141

Mobile County plans to sub-grant all of the 2012 ESG funds with shared administration funds to Housing First, Inc., the CoC lead agency, to administer the Mobile County ESG Program. The agreement with Housing First, Inc. as the ESG administration organization will include and obligate full compliance with the ESG regulations and standards as required by the HEARTH Act and the Federal Register release of December 5, 2011.

Mobile County is aware of the HUD goals for further development of the Homeless Management Information System for accountability while addressing, preventing and ending homelessness and for using ESG to continue basic strategies of the Homeless Prevention and Rapid Re-Housing Program.

The CoC system for centralized assessment includes the United Way 2.1.1 call center, a daytime center for the street homeless known as 15 Place and Family Promise of Coastal Alabama for homeless families. The 2.1.1. center provides initial screening and referral for homeless and at-risk individuals and households. 15 Place is an intervention center with case management referral, mental health and addiction treatment specialist, a VA outreach worker, state employment services and access to other resources. The Family Promise program offers telephone assessment, referrals and case management for homeless families with children.

Street outreach services are provided by a HUD SHP grant funded through Housing First, Inc. the CoC lead organization that is based at 15 Place and operated by Franklin Primary Health Center. A HHS PATH grant for outreach to the homeless mentally ill is also based at 15 Place and operated by AltaPointe, Inc.

The growing demand for emergency shelter denotes a need to include 2012 ESG funding in support of organizations that provide that service. The increased need for domestic violence shelter is documented as related to the economic downturn and unemployment around 9% in Mobile County. The needs for shelter for single women and families have continued to outpace resources.

The Mobile County 2012 ESG funding will include homeless prevention and rapid re-housing as a modified continuation of the Homeless Prevention and Rapid Re-Housing Program (HPRP) that expires this year. Housing First, Inc. has served as the Mobile County HPRP sub-contract administrative organization and would perform a similar role for ESG. Sub-recipient organizations will provide case management access to ESG resources reserved for that purpose. The published homeless definitions and regulations for 2012 ESG prevention and rapid re-housing will supplant HPRP regulations.

The Homeless Management Information System was enhanced under HPRP and became a major accountability activity for reporting the use and impact of resources that target homeless populations. Mobile County will require HMIS participation by all organizations that receive 2012 ESG funding.

## **General Questions**

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.
4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Program Year 3 Action Plan General Questions response:

## **GEOGRAPHIC AREAS OF THE JURISDICTION**

During the process of planning the projects and activities for which grant assistance will be provided, the Grantee allows for a procedure of accepting proposals from Consortium member governments, private non-profit agencies, and the public at large. Following an eligibility determination by the Grants Department, a Project Review Committee (consisting of public works officials, legal staff, a consortium municipal association representative, and County administration staff) examine proposals for feasibility, cost effectiveness, and benefit. The Committee ultimately

develops and recommends a budget for each formula grant program to the County Commission. The goal of this Committee is to address identified needs, geographically distribute funds equitably in accordance with program guidelines, and meet the national objectives of benefitting low and moderate-income persons or aiding in the prevention or elimination of slums and blight.

For those projects designed to benefit low- and moderate-income persons on an area basis, such as various types of public improvements, the budget development process aims at providing assistance in areas of low- and moderate-income as identified in the U.S. Census. In order to benefit low- and moderate-income persons not residing in low/mod tracts, the County will contact HUD to request that a survey be performed to determine income eligibility.

HUD requires at least 51% of households having a median income of less than 80% of the area median income adjusted for size of household to meet this definition. 2010 Census data was not available for inclusion in this report. The following Census Tracts and Block Groups meet the HUD definition for the 2012 Mobile County Consortium for areas of low and moderate-income concentration:

CENSUS TRACT	BLOCK GROUP	% LOW/ MOD	CITY / TOWN
12.00	1	80.0%	Prichard
34.02	1	87.3%	Prichard
38.00	1	54.7%	Chickasaw/Creola
39.01	1	56.9%	Prichard
39.02	1	77.5%	Prichard
40.00	1	86.8%	Prichard
40.00	2	85.1%	Prichard
40.00	3	65.7%	Prichard
40.00	4	76.6%	Prichard
41.00	1	74.2%	Prichard
42.00	1	79.9%	Prichard
43.00	1	86.0%	Prichard
43.00	2	78.2%	Prichard
44.00	1	72.6%	Prichard
44.00	2	70.1%	Prichard
45.00	1	71.1%	Prichard
46.00	1	73.0%	Prichard
46.00	2	83.4%	Prichard
47.00	1	85.1%	Prichard
47.00	2	62.1%	Prichard
48.00	1	94.8%	Prichard
48.00	2	77.7%	Prichard
48.00	3	65.1%	Prichard
49.00	1	70.0%	Prichard
49.00	2	56.5%	Prichard
49.00	3	84.4%	Prichard
49.00	4	67.1%	Prichard
51.00	1	58.9%	Chickasaw
51.00	2	52.7%	Chickasaw
52.00	2	51.6%	Chickasaw
58.00	1	63.4%	

CENSUS TRACT	BLOCK GROUP	% LOW/ MOD	CITY / TOWN
58.00	3	74.5%	
61.03	2	51.1%	Prichard
64.02	2	63.8%	
64.03	1	64.8%	
64.05	2	54.0%	
67.00	1	57.9%	
67.00	3	56.0%	
67.00	4	52.1%	
68.02	1	53.8%	Tillmans Corner CDP
69.01	2	56.5%	Tillmans Corner CDP
71.02	1	62.6%	Theodore CDP
73.00	1	60.3%	Bayou La Batre/Coden
73.00	2	57.5%	Bayou La Batre/Coden
73.00	4	60.1%	Bayou La Batre/Coden

HUD Summary Census 2011

Often, but not always, areas containing a concentration of low/moderate-income households will also be areas of racial or ethnic minority concentrations. 2010 Census data was not available for inclusion in this report. Based upon Census 2000 data, the geographic areas of the jurisdiction that contain racial/minority concentrations are identified as follows:

CENSUS TRACT	BLOCK GROUP	% LOW / MOD	% MINORITY
12.00	1	80.0%	89.8%
34.02	1	87.3%	62.9%
39.01	1	56.9%	95.5%
39.02	1	77.5%	86.2%
40.00	1	86.8%	100.0%
40.00	2	85.1%	98.5%
40.00	3	65.7%	97.5%
40.00	4	76.6%	98.0%
41.00	1	74.2%	99.6%
42.00	1	79.9%	100.0%
43.00	1	86.0%	100.0%
43.00	2	78.2%	100.0%
44.00	1	72.6%	99.1%
44.00	2	70.1%	100.0%
45.00	1	71.1%	93.6%
46.00	1	73.0%	99.0%
46.00	2	83.4%	100.0%
47.00	1	85.1%	87.3%
47.00	2	62.1%	95.0%
48.00	1	94.8%	94.7%
48.00	2	77.7%	91.2%
48.00	3	65.1%	100.0%
49.00	1	70.0%	77.9%
49.00	2	56.5%	91.3%
49.00	3	84.4%	96.6%
49.00	4	67.1%	96.9%
58.00	1	63.4%	52.4%

CENSUS TRACT	BLOCK GROUP	% LOW / MOD	% MINORITY
58.00	2	51.2%	78.3%
58.00	3	74.5%	94.6%
61.03	2	51.1%	53.8%
71.02	1	62.6%	57.9%

HUD Summary Census 2011 & US Census Bureau - Census 2000 Summary File 3 Table P6. Race

The jurisdiction does not anticipate dedicating target areas at this time.

#### BASIS FOR ALLOCATING INVESTMENTS GEOGRAPHICALLY WITHIN THE JURISDICTION

Mobile County Commission allocates investments geographically within the jurisdiction based on four determining factors. PY2012 is no exception. The four factors include: (1) the geographic areas of the jurisdiction targeted for grant assistance as identified above; (2) the assigned priority of needs it has documented in the needs tables; (3) the advisory input from the citizens through the citizens participation process and (4) the "local objectives" defined for the Mobile County Consortium which are listed as follows:

1. Housing and neighborhood preservation, including new housing opportunities principally for low and moderate-income households;
2. Economic development through job retention or creation to benefit low and moderate-income individuals;
3. Public improvements and facilities limited to the support of the first two objectives;
4. Elimination of blight and blighting elements that support the first two objectives;
5. Programs offering significant community benefit in direct support of the first two objectives, including a cost-to-benefit determination; and
6. Capacity of the project to be sustained over the long term (e.g., future maintenance and upkeep).

Reasons for the allocation priorities, the geographic areas of the jurisdiction in which it will direct assistance, and the obstacles to addressing underserved needs are discussed in the Consolidated Plan (2010-2014).

#### PY2012 ACTIONS TO ADDRESS OBSTACLES TO MEETING UNDERSERVED NEEDS

The Action Plan brings into place several elements that will mitigate the identified barriers to Affordable Housing. Down payment assistance, payment of closing costs, and mortgage assistance will remove an economic barrier to affordable housing. The construction of new or improvements to existing public infrastructure will facilitate development of residential building sites without adding significantly to the development costs passed on to the homebuyers. New housing construction will contribute directly to the supply of affordable housing within the planning area.

#### OTHER FEDERAL, STATE AND LOCAL RESOURCES

Other resources, such as additional Section 8/Housing Choice Vouchers, could be made available to one or more of the local public housing authorities. However, since these are unknowns over which the jurisdiction has no control, no goals have been set. The same applies to competitive HEARTH Act Funds received by the local CoC and local homeless service providers.

As explained under the heading of "Homelessness," Housing First, Inc. is the lead agency in a multi-jurisdictional and multi-agency effort to address homelessness. The Consortium will provide a letter of consistency for the CoC to apply for grant funds. The Consortium will provide ESG funds and other funds that may from time to time come available to the CoC and/or its collaborating service providers. Housing First is responsible for implementation and administration of the County's HUD-funded Homelessness Prevention and Rapid ReHousing Program (HPRP). The County plans to enter into a non-competitive sub-grantee agreement with Housing First to administer the Emergency Solutions Grant program. Through this structure the Consortium will carry out its homelessness strategy.

## **Managing the Process**

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Program Year 3 Action Plan Managing the Process response:

Mobile County Commission is the lead agency that oversees the development of the plan and for administering programs covered by the Consolidated Plan and the Annual Action Plan. Mobile County Commission is also the major public agency.

Since the Consortium follows a project selection procedure that requires proposals from member jurisdictions and other public and private agencies to be submitted on an annual basis, public and private agencies (such as housing authorities and non-profits) change from year-to-year and activity-to-activity depending upon the nature of the proposed activities and the funds available.

Mobile County Commission, through its Grants Department, has the responsibility for coordinating the implementation of the Consolidated Plan and Annual Action Plan. This is accomplished through the use of in-house staff, coordination with other governmental, private and non-profit agencies with similar interests and missions. In addition to the Consortium, the major public and private agencies responsible for administering programs in PY2012 covered by the Consolidated Plan include, but are not limited to the following: Family Counseling Center of Mobile dba Consumer Credit Counseling of Mobile County and The Rape Crisis Center of Mobile; The Child Advocacy Center, Inc.; Housing First, Inc.; Independent Living Center of Mobile; Penelope House; Legal Services Alabama; and Ozanam Charitable Pharmacy. Other entities may be added to this list during the year should conditions warrant.

The Grants Department staff of the Mobile County Commission was charged with development of the Annual Action Plan and the Consolidated Plan. The County met with various public and private agencies in order to garner available knowledge of the needs and opportunities facing the community, and organizing and conducting public and governmental involvement meetings. All citizens of the community, especially low- and moderate-income citizens, are provided adequate opportunity to



participate in the planning process in an advisory role in accordance with the Citizens Participation Plan. The Planning Review Committee followed the priority needs identified in the Consolidated Plan. The Planning Review Committee comprised of representatives from Mobile County, the municipalities, the health and social services agencies, and the citizens served in the Urban County.

Mobile County consulted with: all member municipalities in the Urban County Consortium; the Prichard, Chickasaw, and Mobile County Housing Authorities; Habitat for Humanity; South Alabama Regional Planning Commission (SARPC); Ozanam Charitable Pharmacy; the Child Advocacy Center; Housing First, Inc.; the Independent Living Center of Mobile; Alabama Department of Public Health; and Consumer Credit Counseling of Mobile. SARPC prepared a study that identified barriers to affordable housing in Mobile County. In the process of preparing the study, SARPC gathered information from a large number of local service providers, such as homeless service agencies, banks, legal services, housing authorities, agencies that serve individuals with disabilities, and fair housing agencies. This information was provided to the County for use in development of the Consolidated and Action Plans.

The County will continue to meet with the public and private housing, health and social service agencies during the year in order to enhance coordination between all the agencies so that a good exchange of information can occur among these agencies.

## **Citizen Participation**

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

\*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 3 Action Plan Citizen Participation response:

In the process of compiling and developing the Consolidated and Action Plan numerous forms of public input were solicited. Various state and federal agencies, chief elected officials, nonprofit organizations, professional technicians, and citizens at large were contacted concerning the Plans. The Consolidated Plan and Action Plan process have specific citizen participation requirements set forth in a Citizen Participation Plan adopted by the Mobile County Commission in 2002.

The Citizen Participation Plan requires that a public hearing is held at the beginning of the planning stage and prior to public comment and that the plan then be available for citizen review for thirty days prior to submission to HUD. Public hearings were held on December 6, 2011 and December 8, 2011 to solicit citizen comments on housing and community development issues and to explain the

application process. The Notice of Public Hearings was published in the Mobile Register (which is published in Mobile County and is one of the largest newspapers in the state) and 3 smaller local newspapers, and on the County's website. Additionally, translation was available upon request for Spanish-speaking residents.

Public hearing locations are fully handicapped accessible. A public hearing will be held on March 8<sup>th</sup> prior to the public comment period and on April 9<sup>th</sup> prior to submission to encourage citizen participation.

Proposals were accepted through January 17, 2012. A display advertisement was published in the Mobile Register on February 27, 2012. This publication established the beginning of a 30-day comment period that ends on April 9, 2012 as well as provided notice of the March 8<sup>th</sup> and April 9<sup>th</sup> public hearings. A summary of the Action Plan was published as a display advertisement on March 8, 2012. The Action Plan is available for review at all the Consortium member city halls and at various libraries located throughout the County and at the County Commission as well as on the County's website in both English and Spanish.

4. Not applicable

## **Institutional Structure**

1. Describe actions that will take place during the next year to develop institutional structure.

Program Year 3 Action Plan Institutional Structure response:

The Mobile County Program is a Consortium of nine municipalities and the Mobile County Commission. The City of Semmes is a newly incorporated city and has elected to join the Consortium. The Town of Dauphin Island elected to withdraw from the Consortium in 2008.

HUD has designated Mobile County and the nine member municipalities as an Urban County. The Mobile County Commission is the lead agency. The nine-member municipalities are as follows:

Town of Creola  
Town of Mount Vernon  
City of Chickasaw  
City of Citronelle  
City of Saraland  
City of Satsuma  
City of Prichard  
City of Bayou La Batre  
City of Semmes

The City of Mobile is a separate entitlement and not part of the Consortium.

Mobile County Commission, through its Grants Department, has the responsibility for coordinating the implementation of the Consolidated Plan and Annual Action Plan. This is accomplished through the use of in-house staff, coordination with other governmental, private and non-profit agencies with similar interests and missions.

In addition to the Consortium, the major public and private agencies responsible for administering programs covered by the Consolidated Plan include, but are not limited to the following:

Family Counseling Center of Mobile dba Consumer Credit Counseling of Mobile  
County and The Rape Crisis Center of Mobile  
The Child Advocacy Center, Inc.  
Independent Living Center of Mobile  
Ozanam Charitable Pharmacy  
Penelope House  
Legal Services of Alabama  
Housing First, Inc.

Other entities may be added to this list over the year should conditions warrant.

Management responsibility (assigned to the Grants Department) is in-house and in one place; In-house cost evaluation of projects; Interdepartmental and interdisciplinary relationships established; Strong Environmental Department; In-house Legal Department; In-house Grants Department and In-house project management staff in County Engineering Department. In addition, a system for soliciting and evaluating project or activity requests has been instituted with emphasis on meeting project eligibility requirements and on addressing priority needs as well as strategic plan goals and objectives.

The County will continue to seek roundtable discussion meetings with other governmental groups or agencies, financial institutions, public housing agencies and private and nonprofit agencies with similar interests and missions. These meetings enable organizations that share common goals a venue to exchange information. This process creates a mechanism that identifies gaps in service delivery so that planning can be initiated to address the needs gap.

## **Monitoring**

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 3 Action Plan Monitoring response:

The County recognizes its responsibility to ensure that all Community Development Block Grant, Emergency Solutions Grant, and HOME activities fully comply with all federal, state and local regulations. The County will monitor all funds obligated and spent, whether spent directly, through a contract or a sub-recipient agreement to ensure compliance with the federal regulations.

The County will procure, manage and review all public facilities construction to be undertaken with CDBG funds. Construction contracts will be secured through the competitive bid process. All sub-recipient agreements and contracts for professional services or for construction will be procured in accordance with the appropriate portion of 24 CFR part 85.36 and any other procurement regulations that may apply. Sub-recipient agreements will fully comply with all applicable regulations as stipulated in 24 CFR 570.200, 570.500 and 570.502-504. The County will secure appropriate services necessary to implement the goals and objectives as stated in this Action Plan and to ensure all proposed activities are in compliance with the Consolidated Plan.

A Project Review Committee composed of Mobile County administration, legal, engineering, environmental and a member of the Municipal Association review proposed CDBG projects submitted for funding to determine eligibility based on type of activity and national threshold requirements. All projects for the HOME, ESG, and CDBG programs (with the exception of limited clientele activities) shall principally benefit low- and moderate-income persons (<80% HAMFI) or as required by HUD. This documentation will be provided in a form that is acceptable to HUD. All applicants for HOME funds will be properly screened to determine household income levels using the part 5 Section 8 income determinations. Only those persons with household incomes of <80% HAMFI who satisfy the other program requirements will be allowed to participate.

The County will conduct an annual review of each down payment and mortgage assistance participating household to secure evidence of the purchasing household's continued occupancy. This review will occur at twelve-month intervals beginning 12 months from the original date of occupancy. Households who occupy a home constructed by a CHDO will be monitored similarly.

A periodic review will be made of each grant to ensure the timeliness of expenditure and also that the goals and objectives are in compliance with the Consolidated Plan and Action Plan.

Mobile County will be responsible for monitoring ESG activities carried out by sub-grantee, Housing First, as established by HUD as well as any subsequent guidance. The County will utilize a variety of contractual, financial, reporting and monitoring controls, in combination with outcome/performance measures, to ensure prompt and proper use of ESG funds in accordance with the program regulations. The County will monitor Housing First, Inc. on an annual basis to ensure compliance and to ensure that the quality of services delivered by the sub-grantee and its sub-recipients. Following the monitoring visit, a letter will be sent to the sub-grantee recapitulating the visit. If in compliance with the regulations, it will be reflected in the letter. If not in compliance, the letter will include recommendations to bring them into full compliance. The sub-grantee will monitor ESG sub-recipients. Should problems arise, frequency will be increased until issues are resolved, reported and approved by County.

Financial Management - The County requires Sub-Recipients documentation to include as a minimum the following:

Use of Funds

Required match funds (origin and expenditures, if applicable)

Budget controls

Cash management procedures

Procurement

Property asset controls

Audits

In order to ensure that funds are drawn in compliance with cash management regulations, the County draws all funds from the Treasury.

## **Lead-based Paint**

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 3 Action Plan Lead-based Paint response:

The County will require a lead evaluation on any dwelling unit that receives HOME.

The County will continue to require a lead evaluation on any dwelling unit that receives HOME funding. A visual assessment of the unit must be conducted to identify any deteriorated paint, dust, debris and residue, so that these conditions can be corrected prior to closing. The property owner must correct any conditions identified in the visual assessment and all deteriorated paint must be stabilized by properly trained or supervised workers using lead safe work practices. Homebuyers receive the Lead Hazard Information Pamphlet, Lead Disclosure Notice, and the Notice of Lead Reduction.

All expenditures of HUD funds will fully comply with all applicable lead-based paint regulations.

## HOUSING

### Specific Housing Objectives

\*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 3 Action Plan Specific Objectives response:

The emphasis for the need for affordable housing for low- and moderate-income households within the County remains a priority for the Consortium. The County will provide homebuyer counseling accompanied by financial assistance to purchase a home. The County will provide homebuyer counseling through the use of CDBG funds and down payment assistance and closing costs as well as mortgage assistance through the use of HOME funds.

Additionally, an increase in the stock of affordable housing will be made available through the acquisition and rehabilitation of vacant single family homes with the coordination with a Community Housing Development Organization (CHDO) and not for profit and for profit developers.

Refer to pages 9-10.

### Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 3 Action Plan Public Housing Strategy response:

The County provides encouragement to public housing residents to attend the Homebuyer Training Classes by offering these classes at several locations. These classes can become a springboard for residents to attend credit counseling, if they would like to participate in the Down Payment Assistance program but bad credit prevents them from securing a first mortgage. The County will encourage and support efforts of public housing residents to participate in credit counseling with the goal of becoming a future homeowner. The County has formed partnerships with nonprofit organizations to increase Fair Housing activities that public housing residents wish to undertake.

All public housing residents have equal opportunity to benefit from housing assistance as well as public services. No specific actions are proposed in 2012 to address the identified needs of public housing or fund housing improvements and/or resident initiatives.

There are four housing authorities in Mobile County: Mobile County Housing Authority, Chickasaw Housing Authority, Bayou La Batre Housing Authority, and Prichard Housing Authority. There are no public housing agencies in the Consortium jurisdiction designated by HUD as a troubled agency.

## **Barriers to Affordable Housing**

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 3 Action Plan Barriers to Affordable Housing response:

The County provides Homebuyer Training Classes to low- and moderate-income persons to prepare them for understanding the processes and responsibilities of homeownership. The County uses HOME funds to provide assistance to qualified low- and moderate-income homebuyers to pay down payments and eligible closing costs. The County also provides mortgage assistance to homebuyers who purchase homes constructed with County HOME funds.

The County will provide funds to developers for acquisition and rehabilitation of up to seven (7) vacant single family homes for low and moderate income households. The County has already surpassed the 15 percent set aside of HOME funds to a qualified Community Housing Development Organization. However, if a CHDO applies for funding, the County will consider their application. The County will provide CDBG funding to a local nonprofit to provide home modifications for the removal of architectural barriers in dwelling units occupied by handicapped individuals. The County will support the applications of qualified housing organizations for discretionary HUD housing programs such as Section 202/811 by providing Certificates of Consistency where appropriate to support and increase affordable housing units.

## **HOME/ American Dream Down payment Initiative (ADDI)**

1. Describe other forms of investment not described in § 92.205(b).
2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.
3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:



- a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
  - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
  - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
  - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
  - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
  - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
  - a. Describe the planned use of the ADDI funds.
  - b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
  - c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Program Year 3 Action Plan HOME/ADDI response:

The County uses the provisions of 24 CFR 254 (a)(5)(ii)(2) and (4). Recapture net of proceeds; Owner investment returned first. In the event of a voluntary or involuntary transfer of the purchased home during the applicable period of affordability, the County will recapture all or a portion of the direct subsidy provided to the homebuyer. Direct subsidy consists of a deferred loan or loans for down payment assistance and closing costs and/or assistance provided to reduce the purchase price from the appraised value to one of affordability. The loan(s) will be forgiven pro rata as set out in the loan documents over the period of affordability as long as the home remains the principal residence of the home buyer and no other events of default, as are also set out in the loan documents, occur. If there are no net proceeds from the voluntary or involuntary transfer, repayment is not required and HOME requirements are considered to be satisfied. The term net proceeds is defined as sales price less payment of any superior loan and special liens due there under; expenses of sale; and reimbursement of the home buyer for the cost of any improvements to the property and the value of their equity in the purchased home.

The County does not intend to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds.

4. ADDI funds will not be received.

## HOMELESS

### Specific Homeless Prevention Elements

\*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.
2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.
4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Program Year 3 Action Plan Special Needs response:

Mobile County is credited with a pro rata share of HUD SHP funds granted to a three-jurisdictional CoC, AL-501. SHP funds approved for 2012 are listed below:

**2012 HUD SHP Grants****City & County of Mobile, Baldwin County  
Continuum of Care AL501****Jurisdictional  
Assignment**2011 HUD Pro Rata  
Percentages

0.557      0.368      0.075

<b>Agency / Sponsor</b>	<b>Project</b>	<b>Grant Amount</b>	<b>City of Mobile</b>	<b>Mobile County</b>	<b>Baldwin County</b>
AltaPointe Health Systems	Chronic Permanent Housing	371,402	223,584	147,818	
Loaves & Fish Community Ministries	15 Place Day Center	409,834	246,720	163,114	
Penelope House	TLC Transitional Housing Families	146,187	88,005	58,182	
Dumas Wesley Community Center	Family Village Transitional Housing	163,077	98,172	64,905	
Housing First, Inc.	Victory Permanent Housing Disabled	160,019	96,331	63,688	
Family Promise	Case Management Families	78,178	47,063	31,115	
Catholic Social Services Baldwin	Permanent Housing Disabled	123,088			123,088
St. Mary's Home	Transitional Housing Young Adults	148,732	89,537	59,195	
Baldwin Family Violence Shelter	DV Transitional Housing	103,751			103,751
The Salvation Army	Project Able	94,756	57,043	37,713	
Service Center Catholic SocSrvcs	Permanent Housing Disabled	175,061	105,387	69,674	
Housing First, Inc.	Victory Transitional Housing Families	90,284	54,351	35,933	
Franklin Primary Health Center	Substance Abuse Treatment Women	123,060	74,082	48,978	
Housing First, Inc.	Community Housing Program	479,261	266,948	176,368	35,945
Franklin Primary Health Center	Franklin Case Management	86,100	51,832	34,268	
Housing First, Inc.	HMIS	105,000	58,485	38,640	7,875
Housing First, Inc.	Gateway II	120,861	67,320	44,477	9,065
Housing First, Inc.	Gateway I	120,860			120,860
Housing First, Inc.	Gateway III	120,861	74,330	36,258	10,877
AltaPointe Health Systems	Shelter Plus Care	249,084	149,949	99,135	
		<b>\$ 3,469,456</b>	<b>\$ 1,849,139</b>	<b>\$ 1,209,461</b>	<b>\$ 411,460</b>

Other federal grants available to Mobile County for addressing, preventing and ending homelessness are:

Housing First, Inc.: Health & Human Services

SAMHSA Act Team grant for Chronic Homeless

\$400,000 annually

This grant provides intensive case management and treatment services for helping the chronic homeless secure and retain housing.

Housing First, Inc.: Veterans Affairs

Supportive Services for Veteran Families Program \$620,000 annually

This grant is geared to preventing homelessness for veterans and their families.

The needs of the homeless will be addressed directly and indirectly through the accomplishments of the specific activities planned for this year. Mobile County intends to respond to the full range of needs of the homeless. The County has formed partnerships with nonprofit agencies and organizations that provide outreach and assistance to individuals and families that are at risk of becoming homeless. The County provides financial support with CDBG and the County's General fund to support Penelope House, an agency that provides services for abused women and their children. The County provides financial support with ESG and the County's General fund to support Housing First, Inc. the lead agency for Continuum of Care and a multi-service, multi-agency provider for the homeless. The County provides financial support with CDBG for Legal Services Alabama for a Homeless Prevention Project. The County will provide funding for the Homeless Management Information System (HMIS) from the County's ESG Program. HMIS is a program that collects demographic information that the federal government requires in tracking the homeless population. The County, as an eligible grantee, applied and received Homeless Prevention and Rapid Re-Housing Program funds to provide homeless prevention assistance and to provide assistance to rapidly re-house persons who are homeless.

Housing First, Inc. has accepted responsibility for coordinating and encouraging discharge planning to prevent homelessness when individuals are being released from a penal facility, hospital, institution or program that has responsibility for such planning. There are formal protocols in place for health care and mental health institutions that includes an annual letter from Housing First, Inc. to re-new and confirm agreements. Protocol for corrections is under development by the Mobile Area Interfaith Conference and includes plans for a community release center. The State of Alabama Department of Human Resources has a formal and written protocol for preventing homelessness when a youth has aged-out of foster care or from substitute care but limited resources have prevented full implementation. A HUD funded transitional housing project through Housing First, Inc., the lead CoC agency, is available to these youths at St. Mary's Home, either at the time of discharge or after becoming homeless, targeting those who are ages 19-24.

In 2012, the County will receive \$155,141 in ESG funds. Mobile County has met with Housing First, Inc., the Continuum of Care lead organization, and plans to enter into a non-competitive sub-grantee agreement for managing a competitive process and executing sub-recipient agreements for eligible organizations selected for ESG activities that address the needs of the homeless in Mobile County.

Housing First, Inc. has gained substantial experience by successfully administering the Homelessness Prevention Rapid Re-Housing Program (HPRP) for Mobile County, the City of Mobile, and the State of Alabama. They also have experience as a HUD SHP grantee and as a sub-grantee for local HUD funds. Housing First, Inc. operates the jurisdictional Homeless Management Information System (HMIS) and manages permanent and transitional housing projects. Based on their prior successes working with HPRP and other homeless programs, Housing First, Inc. has the capacity to administer the Mobile County Emergency Solutions Grant Program in an effective manner.

Upon HUD approval of the 2012 Action Plan, Mobile County Commission would proceed with the sub-grantee agreement with Housing First, Inc. to create the structure and process required for HMIS, the clearinghouse for clients served, the ESG services to target, and the capacity for financial management of ESG funds.

Housing First, Inc. would extend sub-recipient agreements to established organizations for ESG activities. Activities eligible for funding under ESG include the following: street outreach, emergency shelter, homelessness prevention, rapid re-housing, and administration. An announcement and application would be distributed to eligible CoC organizations that participate in HMIS or will agree to participate. A review committee with representation from the CoC board of directors would make recommendations to the Mobile County Commission regarding the suitability and capacities of sub-recipient applicants. The Mobile County Commission would select the sub-recipient organizations and authorize Housing First, Inc. to execute sub-recipient contracts. The match requirement will be met by sub-grantee, Housing First, Inc, and the ESG sub-recipients as set forth in 24 CFR 576.201.

Standards for administering and evaluating ESG as well as participant standards will be further developed in a plan for implementation by Housing First, Inc. subject to approval by Mobile County. Standards will include the following:

#### **Standards for Administering and Evaluating ESG**

An ESG program must be aligned/coordinated with the CoC goals for reducing/ending homelessness.

A homeless or formerly homeless must participate in the development of an ESG program.

The use of a centralized intake process is preferred and must be described if available. (To become required)

Participants receiving prevention or rapid re-housing assistance must meet with a case manager and there must be a case plan for obtaining/retaining permanent housing.

There must be a formal process for terminating assistance.

Shelters must meet minimum habitability standards.

The use of HUD funds for housing assistance requires that habitability, rent reasonableness and lead paint standards are met.

There must be no conflicts of interest issues.

#### **Suggested Participant Standards for Mobile County ESG**

Eligible Participants	Shelter Prevention	Homeless individuals and families Households, individuals and families, below 30% AMI and imminently at risk
	Rapid Re-Housing	Homeless households, individuals and families, below 30% AMI

"But For" Principal: Other resources must be used prior to ESG or coordinated with other resources.

Participant contribution: Routinely expected to provide/generate 25% of financial assistance needed unless circumstances clearly justify otherwise.

Extent of service:

Rental assistance only for prevention

Full range assistance for rapid re-housing: deposits, rent, utilities, moving, etc.

Maximum of 6 months rental assistance including arrears

The 2012 CoC Chart of Homeless Services available in Mobile County and the 2012 Goals and Strategies for addressing and preventing homelessness provided by Housing First, Inc. are included in the Appendix.

## **Emergency Shelter Grants (ESG)**

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Program Year 3 Action Plan ESG response:

Not Applicable

## **COMMUNITY DEVELOPMENT**

### **Community Development**

\*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.
2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

\*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 3 Action Plan Community Development response:

Please refer to the response to the Community Development Needs Table in the 2010-14 Five-Year Consolidated Plan. Please also refer to the Executive Summary and Project forms of this Action Plan.

## **Antipoverty Strategy**

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 3 Action Plan Antipoverty Strategy response:

Specific elements of this Action Plan will effectively reduce the number of poverty level families through the proposed activities to be undertaken with CDBG and HOME funds yearly. Rehabilitation through the HOME program will result in the creation of new construction jobs. The County will work with nonprofit organizations to identify qualified low-income households to participate in the down payment assistance programs for the homebuyers. Becoming a homeowner will enable some low-income households who have carried an excessive housing cost burden to realize an increase in disposable income thus raising those households up from the poverty level. The planned infrastructure improvements will create entry-level construction jobs that will provide an economic stimulus and benefits for the low- and moderate-income neighborhoods. The County will focus on the elimination of homelessness and the impact of supportive services to low-income households to reduce the number of persons living in poverty.

## **NON-HOMELESS SPECIAL NEEDS HOUSING**

### **Non-homeless Special Needs (91.220 (c) and (e))**

\*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 3 Action Plan Specific Objectives response:

The County has partnered with a local nonprofit, Independent Living Center of Mobile, which specializes in providing services to persons with disabilities, to carry out a home modification program in the County. Up to 5 individuals with disabilities should benefit from this program this year.

The County is not funding any elderly, frail elderly, persons with disabilities, HIV/AIDS, alcohol or other substance abuse housing projects in 2012.

### **Housing Opportunities for People with AIDS**

\*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.



2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.
7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 3 Action Plan HOPWA response:

Not Applicable

### **Specific HOPWA Objectives**

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 3 Specific HOPWA Objectives response:

Not Applicable

## Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

### **PLAN TO AFFIRMATIVELY FURTHER FAIR HOUSING**

It is the policy of Mobile County to comply fully with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a).

The County 1) will take steps to overcome the effects of impediments to fair housing choice that were identified in the County's Analysis of Impediments to Fair Housing Choice; 2) will refer to fair housing agencies for remedy of discrimination in housing; and 3) will promote fair housing choice.

Regarding the County's ESG Program, Housing First, Inc. will affirmatively further fair housing in the ESG Program. These efforts will include:

- Marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency through a variety of marketing means;
- Ensuring that applications and service delivery are accessible to persons with disabilities; and
- Referring participants to fair housing agencies for remedy of discrimination in housing, and promoting fair housing choice.

Records of the aforementioned efforts will be maintained by documenting in program files. The ESG program will maintain participant records that include but is not limited to race, ethnicity, and familial status.

The County will take steps to affirmatively further fair housing in its HOME Program. The steps will include:

- Market the HOME program to all eligible persons, including persons with disabilities and persons with limited English proficiency. Marketing may include newspapers, billboards, television, radio stations, posters, brochures, website, and flyers;
- Make buildings and communications that facilitate applications and service delivery accessible to persons with disabilities; and
- Provide fair housing counseling services or referrals to fair housing agencies.

Records of the aforementioned steps and their impact will be maintained by documenting in program files. The HOME program will maintain participant records that include but is not limited to race, ethnicity, and familial status.

### **PROGRAMS TO ASSIST IN THE PROVISION OF FAIR HOUSING CHOICE**

The 2012 Action Plan includes several activities that contribute to the removal of identified barriers to Fair Housing Choice for many households. The Action Plan includes down payment assistance with HOME funds for homebuyers and the acquisition and rehabilitation of affordable single family housing which will be available to low- and moderate-income households. The Action Plan activities include ADA-compliant home modifications for homeowners with accessibility problems.

One of the major components of the Action Plan is to provide adequate infrastructure to areas within the County that will bring down the development cost so that affordable homes and apartments will be available throughout the County and not concentrated in any one area. By providing better infrastructure to certain areas in the County, the development cost of land in the County will be reduced. The County's goal is to provide incentives to developers to build more affordable housing and thus increase the supply of affordable homes throughout the County.

The Action Plan activities include homebuyer counseling which is offered at various locations throughout the County in order to increase accessibility for all citizens. This counseling can become a springboard for residents to attend credit counseling, if bad credit prevents them from securing a first mortgage. The classes also provide information regarding fair housing.